

EXHIBIT I

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

JAMES HAYDEN,)	
)	CASE NO. 1:17-cv-02635-CAB
Plaintiff,)	
)	JUDGE CHRISTOPHER A. BOYKO
v.)	
)	
2K GAMES, INC. et al.,)	
)	
Defendants.)	

**PLAINTIFF’S SECOND SET OF INTERROGATORIES TO TAKE-TWO
INTERACTIVE SOFTWARE, INC. (14-16)**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiff James Hayden (“Hayden”) propounds the following Interrogatories on Defendant Take-Two Interactive Software, Inc. (“Take-Two”) to be answered separately, under oath, within thirty (30) days after service. These Interrogatories are governed by the following Definitions and Instructions:

DEFINITIONS AND INSTRUCTIONS

Hayden incorporates his “Definitions” and “Instructions” from Plaintiff’s First Set of Interrogatories to Take-Two, served on May 2, 2019, as if fully set forth below. In addition, the following terms shall have the following meanings:

1. The term “**NBA Players**” means LeBron James, Danny Green, and/or Tristan Thompson.

INTERROGATORIES

INTERROGATORY NO. 14

Identify the amount paid by Defendants to use music in the Accused Games each year and identify the royalty rates paid by Defendants to use such music, including the methods used to calculate royalty rates and payments.

INTERROGATORY NO. 15

Describe your efforts to confirm that NBA Properties and/or NBA Players Association holds rights in the Copyrighted Works or rights to grant a license to use the NBA Players' likenesses.

INTERROGATORY NO. 16

For each Accused Game, from how many third parties have Defendants licensed content for inclusion in the Accused Game and how many of those third parties have Defendants paid for such content.

Dated: January 31, 2020

Respectfully submitted,

By: /s/Andrew Alexander

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CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2020, a copy of the foregoing was served on all counsel of record via electronic mail.

/s/ Andrew Alexander

One of the attorneys for Plaintiff